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*Co-Counsel to the Ad Hoc Committee of
Governmental and Other Contingent
Litigation Claimants*

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

PURDUE PHARMA L.P., *et al.*,

Debtors.¹

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Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**THIRTY-SECOND MONTHLY FEE STATEMENT OF GILBERT LLP,
FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES INCURRED AS CO-COUNSEL TO THE AD HOC
COMMITTEE OF GOVERNMENTAL AND OTHER CONTINGENT LITIGATION
CLAIMANTS FOR THE PERIOD MAY 1, 2022 THROUGH MAY 31, 2022**

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Name of Applicant:	Gilbert LLP
Authorized to provide professional services to:	Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants
Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:	December 2, 2019 (Docket #553)
Period for which compensation and reimbursement is sought:	May 1, 2022 through May 31, 2022
Amount of compensation sought as actual, reasonable, and necessary:	\$365,840.40 (80% of \$457,300.50)
Amount of expense reimbursement sought as actual, reasonable and necessary:	\$1,618.96 (100%)
This is a:	Monthly Fee Statement

Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 365 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee’s Professionals* entered by this Court on December 2, 2019 [Docket #553] (the “**Reimbursement Order**”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket #529] (the “**Procedures Order**”), the law firm of Gilbert LLP (“**Gilbert LLP**”), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants (the “**AHC**”), hereby submits this thirty-second monthly fee statement (the “**Monthly Fee Statement**”) for legal services rendered and reimbursement for expenses incurred for the period commencing May 1, 2022 through May 31, 2022 (the “**Application Period**”).

Itemization of Services Rendered and Expenses Incurred

1. Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Application Period by project category. As reflected on Exhibit A, Gilbert LLP incurred \$457,300.50 in fees during the

Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 80% of such fees, totaling \$365,840.40.

2. Annexed hereto as **Exhibit B** is a chart of Gilbert LLP's professionals and paraprofessionals, including title, hourly rate, number of hours billed, and total fees of each attorney and paraprofessional who rendered services to the AHC in connection with these chapter 11 proceedings during the Application Period. The blended hourly rate of the attorneys during the Application Period is \$741.50. The blended hourly rate of paraprofessionals during the Application Period is \$322.56.

3. Annexed hereto as **Exhibit C** is the summary of reasonable and necessary expenses incurred during the Application Period. As reflected on Exhibit C, Gilbert LLP incurred \$1,618.96 in expenses during the Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 100% of such expenses, totaling \$1,618.96.

4. Annexed hereto as **Exhibit D** are the time records of Gilbert LLP for the Application Period, organized by project category with a daily log detailing the time spent by each professional and an itemization of expenses.

FILING AND SERVICE

5. This Monthly Fee Statement will be filed and served in accordance with the directives in the Procedures Order.

6. Pursuant to the Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses as requested shall, within 14 days of service of the Monthly Fee Statement, serve via email, to the Notice Parties (as defined in the Procedures Order), a written notice setting forth the precise nature of the objection and the amount at issue.

7. If an objection is timely served pursuant to the Procedures Order, the Debtors shall be authorized and directed to pay Gilbert LLP the amount equal to 80% of the fees and 100% of the expenses that are not subject to an objection. Any objection must set forth the precise nature of the objection and the amount at issue. It shall not be sufficient to simply object to all fees and expenses.

WHEREFORE, Gilbert LLP respectfully requests compensation in the amount of \$365,840.40 (80% of \$457,300.50) and reimbursement of reasonable and necessary expenses incurred in the amount of \$1,618.96 (100%), for a total amount of \$367,459.36 for the Application Period.

Dated: July 13, 2022
Washington, DC

Respectfully submitted,

GILBERT LLP

/s/ Kami E. Quinn

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*Counsel for the Ad Hoc Committee of
Governmental and Other Contingent
Litigation Claimants.*

Exhibit A

Summary of Services by Category

SUMMARY OF SERVICES BY PROJECT CATEGORY

Project Code	Project Category	Hours Billed in Period	Fees for Period
A004	Case Administration	5.4	\$1,105.00
A009	Meetings / Communications with AHC & Creditors	6.2	\$9,292.50
A019	Plan of Reorganization / Disclosure Statement	2.0	\$3,600.00
A020	Insurance Adversary Proceeding	644.2	\$443,303.00
		657.8	\$457,300.50

Exhibit B

Summary of Compensation by Professional

Name of Professional	Position / Year Admitted Practice	Hourly Billing Rate	Hours Billed for Period	Total Fees for Period
Scott D. Gilbert	Partner / District of Columbia – 1979 U.S. Court of Appeals for the District of Columbia – 1980 U.S. Court of International Trade – 1984 U.S. Supreme Court – 1987 U.S. District Court for the District of Columbia – 2008 Cherokee Nation – 2017 U.S. Court of Federal Claims – 2019	\$1,800	5.4	\$9,720.00
Kami Quinn	Partner / Commonwealth of Virginia – 2000 District of Columbia – 2006 U.S. Court of Appeals for the Third Circuit – 2009	\$1,250	1.9	\$2,375.00
Richard Leveridge	Partner / District of Columbia – 1981 State of New York – 1997	\$1,450	65.8	\$95,410.00
Richard Shore	Partner / State of New York – 1988 District of Columbia – 1989 U.S. Court of Appeals for the Third Circuit – 2009 U.S. Court of Appeals for the Fourth Circuit – 2014 U.S. Court of Appeals for the Ninth Circuit – 2014 U.S. Court of Appeals for the Fifth Circuit – 2017 Cherokee Nation – 2017	\$1,450	22.2	\$32,190.00
Jason Rubinstein	Partner / State of Maryland – 2006 District of Columbia – 2007 U.S. District Court for the District of Maryland – 2007 U.S. District Court for the District of Columbia – 2011	\$850	106.8	\$90,780.00
Jenna Hudson	Partner / State of Maryland – 2010 State of Massachusetts – 2010 District of Columbia – 2011 U.S. District Court for the District of Maryland – 2011 U.S. Court of Appeals for the First Circuit – 2015 U.S. Supreme Court – 2016 Cherokee Nation – 2017 U.S. District Court for the District of Columbia – 2019	\$785	7.7	\$6,044.50
Mike Rush	Of Counsel / State of Delaware – 2007 District of Columbia – 2017	\$700	99.1	\$69,370.00
Sarah Sraders	Associate / State of New York – 2016 District of Columbia – 2017	\$660 ²	17.2	\$11,352.00
Alison Gaske	Associate / District of Columbia – 2016	\$610	39.5	\$24,095.00
Ethan Kaminsky	Associate / State of New York – 2018	\$560	31.7	\$17,752.00
Ifenanya Agwu	Associate / District of Columbia – 2022	\$420	113.0	\$47,460.00
John Girgenti	Staff Attorney / State of New York – 2002 District of Columbia – 2007	\$365	74.8	\$27,302.00
Blair Hubbard	Director of Analytics – Joined firm in 2021	\$425	28.4	\$12,070.00
Alyssa Bonesteel	eDiscovery & Policy Review Coordinator– Joined firm in 2018	\$375	9.9	\$3,712.50
Sherley Martinez	Paralegal – Joined firm in 2017	\$325	4.7	\$1,527.50

² Ms. Sraders rate increase is due a promotion that was effective as of May 1, 2022.

Name of Professional	Position / Year Admitted Practice	Hourly Billing Rate	Hours Billed for Period	Total Fees for Period
Sara Ogrey	Paralegal – Joined firm in 2019	\$240	5.0	\$1,200.00
Carmen Turner	Project Assistant – Joined firm in 2021	\$200	24.7	\$4,940.00
	Totals		657.8	\$457,300.50
	Attorney Blended Rate	\$741.50		
	Paraprofessional Blended Rate	\$322.56		

Exhibit C

Summary of Expenses Incurred

SUMMARY OF EXPENSES INCURRED

DESCRIPTION	Total Expenses for Period
Contracted Professional Services – Litigation Support Vendor	\$1,618.96
Total	\$0.00

Exhibit D

Time and Expense Detail

GILBERT LLP

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Ad Hoc Committee
c/o Marshall S. Huebner
Davis Polk & Wardwell LLP
450 Lexington Avenue
New York, NY 10017

June 22, 2022
Invoice Number: 11327095
Client Number: 1599
Tax ID: 52-2283869

FOR PROFESSIONAL SERVICES RENDERED through May 31, 2022

Re: Ad Hoc Committee (Purdue)

Matter Description	Fees	Costs	Total
Purdue Bankruptcy	457,300.50	1,618.96	458,919.46
Total	457,300.50	1,618.96	458,919.46

TOTAL FEES \$ 457,300.50

TOTAL EXPENSES \$ 1,618.96

TOTAL FEES AND EXPENSES \$ 458,919.46

FOR PROFESSIONAL SERVICES RENDERED through May 31, 2022

Purdue Bankruptcy

A004: Case Administration

Name	Date	Services	Hours	Amount
Turner, C.	5/02/22	Review insurance-related pleading recently filed in case.	.70	140.00
Turner, C.	5/11/22	Review insurance-related pleadings recently filed in case.	1.70	340.00
Martinez, S.	5/12/22	Review state litigation tracking sheet re litigations filed against pharmacy entities.	.20	65.00
Turner, C.	5/18/22	Review and organize recently filed insurance-related pleadings.	1.80	360.00
Turner, C.	5/26/22	Review and organize insurance-related pleadings recently filed in case.	1.00	200.00
Project Total:			5.40	\$ 1,105.00

A009: Meetings / Communications with AHC & Creditors

Name	Date	Services	Hours	Amount
Gilbert, S.	5/03/22	Confer with AHC re status.	.50	900.00
Gilbert, S.	5/04/22	Confer with AHC re plan.	.90	1,620.00
Quinn, K.	5/04/22	Participate in call with client re update.	.90	1,125.00
Shore, R.	5/04/22	Confer with AHC re status.	.90	1,305.00
Gilbert, S.	5/11/22	Attend meeting with AHC re status.	1.00	1,800.00
Quinn, K.	5/11/22	Confer with client re status.	1.00	1,250.00
Hudson, J.	5/11/22	Attend AHC meeting (partial).	.50	392.50
Gilbert, S.	5/31/22	Confer with AHC re status.	.50	900.00
Project Total:			6.20	\$ 9,292.50

A019: Plan of Reorganization / Disclosure Statement

Name	Date	Services	Hours	Amount
Gilbert, S.	5/04/22	Confer with AHC and fifteen re status.	1.00	1,800.00
Gilbert, S.	5/06/22	Confer with A. Preis re plan issues.	.50	900.00
Gilbert, S.	5/09/22	Confer with Financial Advisors re KEIP/KERP.	.50	900.00
Project Total:			2.00	\$ 3,600.00

Invoice Number: 11327095
June 22, 2022

A020: Insurance Adversary Proceeding

Name	Date	Services	Hours	Amount
Rubinstein, J.	5/01/22	Review supplemental interrogatory responses of XLIA.	.50	425.00
Hudson, J.	5/02/22	Confer with team re insurance recovery strategy and next steps.	.20	157.00
Hudson, J.	5/02/22	Analyze next steps following call with insurers re AHC log.	.40	314.00
Rubinstein, J.	5/02/22	Analysis re experts (1.2); correspond with Debtors' counsel re policy stipulation project (0.2); analysis re common interest assertions (0.7); confer with team re strategy (0.2).	2.30	1,955.00
Rush, M.	5/02/22	Review Marsh documents.	3.20	2,240.00
Rush, M.	5/02/22	Review draft responses to requests for admissions.	.30	210.00
Gaske, A.	5/02/22	Communicate with K. Hough re ensuring comprehensiveness of Marsh production.	.30	183.00
Leveridge, R.	5/02/22	Confer with co-counsel re discovery issues and related matters (1.7); confer with team re case strategy (0.2).	1.90	2,755.00
Sraders, S.	5/02/22	Confer with team re recent developments and strategy for next steps.	.20	132.00
Kaminsky, E.	5/02/22	Confer with team re case update.	.20	112.00
Kaminsky, E.	5/02/22	Review documents re request for production.	1.30	728.00
Kaminsky, E.	5/02/22	Analyze strategy for defensive discovery.	.40	224.00
Turner, C.	5/02/22	Review and organize third-party subpoenas.	.40	80.00
Turner, C.	5/02/22	Calendar R. O'Connor deposition.	.40	80.00
Turner, C.	5/02/22	Review XL letter re discovery.	.10	20.00
Hubbard, B.	5/02/22	Prepare draft allocation model to roughly analyze the impact of trigger on recovery.	2.30	977.50
Hudson, J.	5/03/22	Revise categories in categorical privilege log in response to question raised by insurers.	.10	78.50
Girgenti, J.	5/03/22	Review and identify privilege log issues related to specific parties and attorneys.	1.50	547.50
Rubinstein, J.	5/03/22	Correspond with co-plaintiffs' counsel re discovery issues (0.2); revise draft responses to Navigators request for admissions and interrogatories (1.8); review Marsh production documents in preparation for Marsh depositions (1.3).	3.30	2,805.00
Rush, M.	5/03/22	Continue reviewing Marsh documents.	2.60	1,820.00
Rush, M.	5/03/22	Review materials in preparation for Marsh depositions.	2.60	1,820.00

Invoice Number: 11327095
June 22, 2022

Name	Date	Services	Hours	Amount
Martinez, S.	5/03/22	Review and organize mediation report and ancillary documents.	.40	130.00
Martinez, S.	5/03/22	Review and revise litigation and arbitration correspondence tracker.	.80	260.00
Gaske, A.	5/03/22	Review Marsh production database to ensure comprehensiveness.	.70	427.00
Gaske, A.	5/03/22	Review certain sections of draft response to Navigators' requests for admission and related interrogatories to ensure consistency.	1.10	671.00
Gaske, A.	5/03/22	Revise policy comparison spreadsheets (1.1); draft status update re policy stipulation progress (0.8).	1.90	1,159.00
Leveridge, R.	5/03/22	Review draft responses to discovery and comment on same.	1.10	1,595.00
Kaminsky, E.	5/03/22	Revise privilege log (1.3); review documents re AHC production (1.2).	2.50	1,400.00
Turner, C.	5/03/22	Review and organize third-party subpoenas.	.30	60.00
Hubbard, B.	5/03/22	Revise draft allocation model to roughly analyze the impact of trigger on recovery.	3.60	1,530.00
Hudson, J.	5/04/22	Confer with co-plaintiffs' counsel re responding to insurers' deficiency letter to Committees.	.70	549.50
Hudson, J.	5/04/22	Revise response to insurers' deficiency letter to Committees.	.40	314.00
Rubinstein, J.	5/04/22	Review proposed edits to responses to Navigators request for admissions and interrogatories (1.1); update tracking of discovery correspondence (0.7); communicate with M. Rush re potential motion to compel letter to Court (0.1); correspond with Debtors' counsel re same (0.2); review follow-up letters to meet-and-confers (0.3); review revised letter to insurers re Committee production logs (0.5); provide comments on revised AHC privilege log (0.3); update litigation task list (0.4); confer with co-plaintiffs' counsel re discovery issues (0.7); follow-up discussion with R. Leveridge re same (0.3); review proposed edits to letter re privilege logs (0.2); review Marsh objections and responses to deposition subpoena (0.3).	5.10	4,335.00
Rush, M.	5/04/22	Continue reviewing materials in preparation for Marsh depositions.	3.50	2,450.00
Rush, M.	5/04/22	Communicate with team re insurers' discovery responses.	1.80	1,260.00
Rush, M.	5/04/22	Draft letter to Court re discovery issues.	2.10	1,470.00
Martinez, S.	5/04/22	Revise insurer correspondence tracker.	.10	32.50
Gaske, A.	5/04/22	Draft summary of argument for Issue #27.	2.20	1,342.00

Invoice Number: 11327095
June 22, 2022

Name	Date	Services	Hours	Amount
Leveridge, R.	5/04/22	Analyze discovery issues (0.9); conference call with co-counsel re same (0.7).	1.60	2,320.00
Sraders, S.	5/04/22	Communicate with M. Rush re letter to Court re discovery issues.	.10	66.00
Kaminsky, E.	5/04/22	Revise privilege log for AHC production.	1.00	560.00
Kaminsky, E.	5/04/22	Confer with Committees re meet-and-confer with insurers on discovery.	.70	392.00
Turner, C.	5/04/22	Review AGLIC production letter.	.20	40.00
Turner, C.	5/04/22	Review Zurich, NAE and Aspen, and Gulf and St. Paul letters re meet-and-confer.	.60	120.00
Turner, C.	5/04/22	Review adversary counsel lists.	.60	120.00
Turner, C.	5/04/22	Calendar plaintiffs' response to Navigators.	.20	40.00
Hubbard, B.	5/04/22	Summarize results from draft allocation model to roughly analyze the impact of trigger on recovery.	2.80	1,190.00
Shore, R.	5/05/22	Confer with J. Hudson, R. Leveridge, J. Rubinstein, M. Rush, A. Gaske, S. Sraders, E. Kaminsky, B. Hubbard, I. Agwu, S. Martinez, and S. Ogrey re case strategy.	.80	1,160.00
Hudson, J.	5/05/22	Confer with team re litigation status and strategy.	.80	628.00
Hudson, J.	5/05/22	Review response to deficiency letter.	.10	78.50
Rubinstein, J.	5/05/22	Revise litigation task list (0.2); confer with team re case update (0.8); revise meet-and-confer letter (1.3); revise letter to Court re discovery issues (1.5); review production correspondence (0.1); communicate with Debtors' counsel re substantial completion (0.3); correspond with team re experts (0.2); analyze National Union letter (0.1); correspond with Debtors' counsel re proposed response to same (0.1).	4.60	3,910.00
Rush, M.	5/05/22	Review strategy re Marsh depositions.	.50	350.00
Rush, M.	5/05/22	Draft letter to Court re discovery issues.	5.20	3,640.00
Rush, M.	5/05/22	Confer with team re case status and strategy.	.80	560.00
Martinez, S.	5/05/22	Confer with J. Hudson, R. Shore, R. Leveridge, J. Rubinstein, M. Rush, I. Agwu, A. Gaske, S. Sraders, E. Kaminsky, B. Hubbard, and S. Ogrey re case strategy.	.80	260.00
Gaske, A.	5/05/22	Confer with team re litigation strategy and next steps.	.80	488.00
Gaske, A.	5/05/22	Revise policy comparison spreadsheet for Insurers #18, #19, and #20.	1.90	1,159.00
Gaske, A.	5/05/22	Analyze re status of memorandum on Issue #61.	.10	61.00

Invoice Number: 11327095
June 22, 2022

Name	Date	Services	Hours	Amount
Leveridge, R.	5/05/22	Revise letters re defensive and offensive discovery (1.6); communications with co-counsel re same (0.3).	1.90	2,755.00
Leveridge, R.	5/05/22	Confer with team re litigation status.	.80	1,160.00
Ogrey, S.	5/05/22	Review and organize Marsh responses to 30(b)(6) request.	.20	48.00
Ogrey, S.	5/05/22	Review and organize AGLIC and Steadfast fourth production.	.20	48.00
Ogrey, S.	5/05/22	Confer with J. Hudson, R. Shore, R. Leveridge, J. Rubinstein, M. Rush, A. Gaske, S. Sraders, E. Kaminsky, B. Hubbard, I. Agwu, S. Martinez, and S. Ogrey re case strategy.	.80	192.00
Sraders, S.	5/05/22	Confer with team re recent developments and next steps.	.80	528.00
Kaminsky, E.	5/05/22	Revise deficiency letter re request for production.	.70	392.00
Kaminsky, E.	5/05/22	Confer with team re status and strategy.	.80	448.00
Hubbard, B.	5/05/22	Synthesize initial findings from rough allocation modeling.	4.40	1,870.00
Hubbard, B.	5/05/22	Confer with team re status and strategy.	.80	340.00
Agwu, I.	5/05/22	Confer with team for case status and strategy.	.80	336.00
Shore, R.	5/06/22	Review and revise letter to Judge Drain re discovery issues (0.9); confer with team re same (0.6).	1.50	2,175.00
Hudson, J.	5/06/22	Confer with co-plaintiffs' counsel re responding to insurers' deficiency letter.	.70	549.50
Rubinstein, J.	5/06/22	Revise discovery letter to Court (0.3); confer with R. Shore, M. Rush and R. Leveridge re same (0.6); communications with co-plaintiffs re discovery issues (0.2); analysis re policy stipulation project (0.3); review Debtors' production correspondence (0.2); confer with co-plaintiff counsel re privilege log and discovery issues (0.8); claim analysis (0.1).	2.50	2,125.00
Rush, M.	5/06/22	Confer with team re letter to Court re Liberty.	.60	420.00
Rush, M.	5/06/22	Revise letter to Court re Liberty discovery.	1.20	840.00
Rush, M.	5/06/22	Confer with co-counsel re discovery issues.	.80	560.00
Leveridge, R.	5/06/22	Confer with team re discovery issues (0.6); confer with co-counsel re same (0.8); review correspondence from opposing counsel re same (1.4).	2.80	4,060.00
Ogrey, S.	5/06/22	Review subpoena issued re Marsh responses to 30(b)(6) deposition.	.20	48.00
Kaminsky, E.	5/06/22	Confer with co-counsel re defensive discovery strategy.	.80	448.00

Invoice Number: 11327095
June 22, 2022

Name	Date	Services	Hours	Amount
Turner, C.	5/06/22	Review and organize third-party subpoenas.	.50	100.00
Hubbard, B.	5/06/22	Review prior claim listings received from plaintiffs' attorneys (0.6); draft request for follow up details (0.8).	1.40	595.00
Agwu, I.	5/06/22	Review past notice research for drafting letter to Court re Liberty's discovery responses.	.40	168.00
Hudson, J.	5/08/22	Review materials exchanged under common interest to confirm applicable timeframe in response to insurer requests.	.10	78.50
Rubinstein, J.	5/08/22	Review letters from Liberty re Committee privilege logs and open discovery disputes (0.7); outline issues for Marsh document review in preparation for depositions (0.6).	1.30	1,105.00
Gilbert, S.	5/09/22	Confer with J. Hudson re insurance strategy.	.50	900.00
Hudson, J.	5/09/22	Review materials exchanged under common interest to confirm applicable timeframe in response to insurer requests.	.10	78.50
Hudson, J.	5/09/22	Revise privilege log to clarify scope of common interest designations.	.10	78.50
Hudson, J.	5/09/22	Confer with S. Gilbert re insurance and next steps.	.50	392.50
Girgenti, J.	5/09/22	Confer with J. Rubinstein, R. Leveridge, M. Rush and I. Agwu re Marsh document review and deposition topics.	1.20	438.00
Girgenti, J.	5/09/22	Review and code Marsh documents for specific deposition topics and issues.	6.40	2,336.00
Rubinstein, J.	5/09/22	Revise topic outline re Marsh (1.0); confer with team re review of Marsh production and deposition preparation (1.2); confer with B. Hubbard re claim data analysis (0.4); communications re Prime Clerk (0.3); correspond with insurers and co-plaintiffs re deposition protocol (0.2); review issues in preparation for Marsh deposition preparation (0.9); confer with R. Leveridge re various discovery issues (0.5); analysis re discovery responses re insurer inquiries re privilege log (0.3).	4.80	4,080.00
Rush, M.	5/09/22	Confer with team re Marsh deposition preparation (1.2); review documents re same (1.5).	2.70	1,890.00
Rush, M.	5/09/22	Review materials and strategy in preparation for Marsh depositions.	4.10	2,870.00
Bonesteel, A.	5/09/22	Review incoming insurer productions and update production log.	1.30	487.50

Invoice Number: 11327095
June 22, 2022

Name	Date	Services	Hours	Amount
Leveridge, R.	5/09/22	Analyze defensive and offensive discovery issues (0.4); confer with team re Marsh deposition (1.2); confer with J. Rubinstein re discovery strategy and related issues (0.5).	2.10	3,045.00
Kaminsky, E.	5/09/22	Draft response to deficiency letter re defensive discovery.	2.00	1,120.00
Turner, C.	5/09/22	Research Allied World letter.	.90	180.00
Hubbard, B.	5/09/22	Confer with J. Rubinstein and R. Leveridge re claims data (0.4); provide correspondence to team re information received from Prime Clerk (1.2); communicate with J. Rubinstein re question related to same (0.6).	2.20	935.00
Hubbard, B.	5/09/22	Confer with G. Pasabangi (Prime Clerk) re underlying submission details.	.40	170.00
Agwu, I.	5/09/22	Confer with M. Rush, J. Rubinstein, and J. Girgenti re review of Marsh production.	1.20	504.00
Agwu, I.	5/09/22	Analyze Marsh production for upcoming depositions.	4.80	2,016.00
Hudson, J.	5/10/22	Review potential responses to insurer questions re privilege log.	.60	471.00
Girgenti, J.	5/10/22	Continue analyzing and coding Marsh documents for specific deposition topics and issues.	7.50	2,737.50
Rubinstein, J.	5/10/22	Communicate with team re policy stipulation project (0.1); continue reviewing issues re deposition Marsh (0.9); communicate with co-plaintiff counsel (0.6); confer with R. Leveridge re status of litigation projects (0.5); revise responses to Navigators request for admissions and interrogatories (2.1); communicate with co-plaintiffs' counsel re same (0.7); confer with team re AHC privilege log and response to insurer letter re same (0.6).	5.50	4,675.00
Rush, M.	5/10/22	Continue reviewing materials in preparation for Marsh depositions.	3.20	2,240.00
Bonesteel, A.	5/10/22	Review incoming insurer productions (0.4); update production log (1.5).	1.90	712.50
Gaske, A.	5/10/22	Review memorandum re Issue #61.	.20	122.00
Leveridge, R.	5/10/22	Review material re challenges to AHC privilege logs (0.6); confer with team re same (0.6).	1.20	1,740.00
Leveridge, R.	5/10/22	Review revised response to discovery from Navigators (0.5); communications with Debtors' counsel re same (0.6); confer with J. Rubinstein re litigation strategy (0.5).	1.60	2,320.00
Kaminsky, E.	5/10/22	Confer with R. Leveridge and R. Rubinstein re discovery strategy.	.60	336.00

Invoice Number: 11327095
June 22, 2022

Name	Date	Services	Hours	Amount
Kaminsky, E.	5/10/22	Review documents re response to deficiency letter re defensive discovery.	3.90	2,184.00
Kaminsky, E.	5/10/22	Draft response to insurer deficiency letter re defensive discovery.	.80	448.00
Turner, C.	5/10/22	Review and organize third-party subpoenas.	.20	40.00
Hubbard, B.	5/10/22	Review underlying claim files (1.9); draft email re claim data request (0.7).	2.60	1,105.00
Agwu, I.	5/10/22	Analyze Marsh production for upcoming depositions.	8.00	3,360.00
Shore, R.	5/11/22	Review discovery issues (1.9), confer with co-counsel re same (0.6).	2.50	3,625.00
Hudson, J.	5/11/22	Confer with co-plaintiffs' counsel re responding to Navigators' discovery requests.	.60	471.00
Hudson, J.	5/11/22	Confer with co-plaintiffs' counsel re responding to most recent deficiency letter.	.40	314.00
Girgenti, J.	5/11/22	Continue reviewing and coding Marsh documents for specific deposition topics and issues.	5.10	1,861.50
Rubinstein, J.	5/11/22	Confer with M. Rush and R. Leveridge re Marsh deposition preparation (1.7); review historic discovery materials re Marsh deposition issues (0.5); review revised discovery responses to Navigators and prepare for call with co-plaintiff counsel re same (0.5); confer with co-plaintiff counsel re draft responses to Navigators request for admissions and interrogatories (0.6); revise response to Liberty re AHC production and privilege log (0.7); review revised draft of response to Liberty letter of April 14 (0.3); confer with co-plaintiffs' counsel re response letters to Liberty re Committee productions and logs (0.5).	4.80	4,080.00
Rush, M.	5/11/22	Continue analysis of issues in preparation for Marsh depositions.	2.40	1,680.00
Rush, M.	5/11/22	Confer with J. Rubinstein and R. Leveridge re Marsh depositions.	1.70	1,190.00
Rush, M.	5/11/22	Confer with co-counsel re discovery responses.	.60	420.00
Rush, M.	5/11/22	Analyze document review issues.	.40	280.00
Martinez, S.	5/11/22	Review and organize discovery requests.	.10	32.50
Leveridge, R.	5/11/22	Confer with team re third-party discovery (1.7); communicate with co-counsel re same (0.2); review third-party production material from co-counsel (1.0).	2.90	4,205.00
Leveridge, R.	5/11/22	Communications with co-counsel re discovery directed to Committees (1.0); review material re same (1.7).	2.70	3,915.00

Invoice Number: 11327095
June 22, 2022

Name	Date	Services	Hours	Amount
Leveridge, R.	5/11/22	Confer with co-counsel re discovery responses to Navigators.	.60	870.00
Ogrey, S.	5/11/22	Revise response letter to Mintz re AHC production in response to Liberty request for productions.	1.30	312.00
Kaminsky, E.	5/11/22	Draft response to insurer deficiency letter re defensive discovery.	3.80	2,128.00
Kaminsky, E.	5/11/22	Confer with co-counsel re defensive discovery strategy.	.60	336.00
Turner, C.	5/11/22	Revise response letter to Mintz re AHC production in response to Liberty request for productions.	2.50	500.00
Agwu, I.	5/11/22	Analyze Marsh production for upcoming depositions.	8.00	3,360.00
Shore, R.	5/12/22	Confer with R. Leveridge, J. Rubinstein, M. Rush, E. Kaminsky, J. Girgenti, I. Agwu, S. Martinez, S. Ogrey, and C. Turner re case strategy.	.90	1,305.00
Shore, R.	5/12/22	Review discovery issues.	.30	435.00
Girgenti, J.	5/12/22	Confer with team re litigation update.	.90	328.50
Girgenti, J.	5/12/22	Analyze and code Marsh documents for specific deposition topics and issues.	5.00	1,825.00
Rubinstein, J.	5/12/22	Analyze NAE and Aspen amended answer and affirmative defenses (1.0); update litigation task list (0.5); confer with team re litigation status and strategy (0.9); review May 12 letter from Navigators and provide thoughts re same (0.4); investigation re claimant data (1.4); review revisions to discovery responses to Navigators (0.3); analysis re experts (0.2); revise draft discovery letter re privilege logs (0.4); review draft response to National Union letter (0.3).	5.40	4,590.00
Rush, M.	5/12/22	Review insurers' documents.	4.60	3,220.00
Rush, M.	5/12/22	Confer with team re case status and strategy	.90	630.00
Martinez, S.	5/12/22	Confer with R. Shore, R. Leveridge, J. Rubinstein, M. Rush, E. Kaminsky, J. Girgenti, I. Agwu, S. Ogrey and C. Turner re case status and strategy.	.90	292.50
Bonesteel, A.	5/12/22	Review incoming insurer productions (0.4); update production log (1.0).	1.40	525.00
Leveridge, R.	5/12/22	Communicate with co-counsel and opposing counsel re response to discovery communications to Committees from Liberty (0.4); revise draft response (0.5).	.90	1,305.00
Leveridge, R.	5/12/22	Confer with team re case status (0.9); analyze offensive and defensive discovery issues (0.5); analyze privilege log issues (0.6); review status of personal injury claims analysis (0.6).	2.60	3,770.00

Invoice Number: 11327095
June 22, 2022

Name	Date	Services	Hours	Amount
Ogrey, S.	5/12/22	Confer with R. Shore, R. Leveridge, J. Rubinstein, M. Rush, E. Kaminsky, J. Girgenti, I. Agwu, S. Martinez, S. Ogrey and C. Turner re case strategy.	.90	216.00
Kaminsky, E.	5/12/22	Confer with team re strategy and status.	.90	504.00
Kaminsky, E.	5/12/22	Research re discovery issue.	.80	448.00
Turner, C.	5/12/22	Confer with team re litigation strategy and case updates.	.90	180.00
Turner, C.	5/12/22	Review Navigators letter.	.40	80.00
Hubbard, B.	5/12/22	Revise proposed correspondence re additional PI claim detail request.	.80	340.00
Agwu, I.	5/12/22	Analyze Marsh production for upcoming depositions.	6.00	2,520.00
Agwu, I.	5/12/22	Confer with team re case update.	.90	378.00
Hudson, J.	5/13/22	Confer with AHC co-counsel re common interest materials and privilege log.	.40	314.00
Girgenti, J.	5/13/22	Continue reviewing and coding Marsh documents for specific deposition topics and issues.	5.10	1,861.50
Rubinstein, J.	5/13/22	Communicate with M. Rush re Marsh document review process (0.4); review NAE/Aspen correspondence to Court (0.1); communications with co-plaintiffs re discovery responses (0.2); review correspondence re document production and privilege log issues (0.2); revise discovery letters to Navigators (1.0).	1.90	1,615.00
Rush, M.	5/13/22	Review Marsh documents.	1.20	840.00
Rush, M.	5/13/22	Research re discovery issue.	.30	210.00
Rush, M.	5/13/22	Draft letter to Navigators re discovery issues.	1.20	840.00
Rush, M.	5/13/22	Draft letter to Navigators re affirmative defenses.	.70	490.00
Leveridge, R.	5/13/22	Confer with co-counsel for AHC re discovery issues (0.4); analysis re offensive discovery (2.0).	2.40	3,480.00
Kaminsky, E.	5/13/22	Research re discovery issue.	2.00	1,120.00
Kaminsky, E.	5/13/22	Draft response to insurer deficiency letter re defensive discovery.	.90	504.00
Kaminsky, E.	5/13/22	Confer with co-counsel re defensive production.	.40	224.00
Turner, C.	5/13/22	Review Federation subpoena.	.10	20.00
Agwu, I.	5/13/22	Analyze Marsh production for upcoming depositions.	6.00	2,520.00
Rubinstein, J.	5/15/22	Communicate with Debtors' counsel re proposed dates for 30(b)(6) deposition re insurance topics.	.20	170.00
Shore, R.	5/16/22	Confer with J. Rubinstein and R. Leveridge re potential experts.	.20	290.00

Invoice Number: 11327095
June 22, 2022

Name	Date	Services	Hours	Amount
Shore, R.	5/16/22	Review and revise discovery letters (1.9); confer with J. Rubinstein re same (0.1).	2.00	2,900.00
Girgenti, J.	5/16/22	Analyze and code Marsh documents for specific deposition topics and issues.	5.10	1,861.50
Rubinstein, J.	5/16/22	Correspond with Debtors' counsel re edits to Navigators discovery letter (0.3); analysis re potential experts (1.8); confer with R. Shore and R. Leveridge re same (0.2); review materials circulated re research (0.8); confer with R. Leveridge re offensive case (0.4); review draft discovery letters (0.4); review AIGLIC/Steadfast discovery letter and provide comments re response (0.5); revise letter to insurers re AHC privilege log and production (0.9); review R. Shore proposed edits to discovery letters (0.4).	5.70	4,845.00
Rush, M.	5/16/22	Draft letter to Navigators re affirmative defenses.	.40	280.00
Rush, M.	5/16/22	Draft letter to Navigators re discovery issues.	.50	350.00
Rush, M.	5/16/22	Analyze Purdue claims.	3.00	2,100.00
Rush, M.	5/16/22	Communicate with team re potential experts.	.40	280.00
Rush, M.	5/16/22	Review discovery correspondence.	.50	350.00
Gaske, A.	5/16/22	Review at-issue policies for certain language.	2.40	1,464.00
Leveridge, R.	5/16/22	Communicate with co-counsel re discovery issues (1.3); confer with J. Rubinstein re offensive discovery (0.4).	1.70	2,465.00
Leveridge, R.	5/16/22	Review edits to draft letter to insurers re discovery to committees.	.90	1,305.00
Leveridge, R.	5/16/22	Confer with team re potential experts (0.2); review material re potential experts (1.5); communicate with co-counsel re same (0.5).	2.20	3,190.00
Sraders, S.	5/16/22	Confer with C. Turner re materials for proposed medical expert.	.40	264.00
Sraders, S.	5/16/22	Research re broker/insured privilege.	1.30	858.00
Kaminsky, E.	5/16/22	Revise discovery correspondence.	.40	224.00
Turner, C.	5/16/22	Review plaintiffs' objections and responses to Navigators requests for admissions.	.10	20.00
Turner, C.	5/16/22	Research re potential medical expert.	2.10	420.00
Turner, C.	5/16/22	Confer with S. Sraders re researching potential medical expert.	.40	80.00
Agwu, I.	5/16/22	Continue analyzing Marsh production for upcoming depositions.	8.00	3,360.00

Invoice Number: 11327095
June 22, 2022

Name	Date	Services	Hours	Amount
Shore, R.	5/17/22	Communicate with J. Rubinstein, R. Leveridge, and A. Gaske re legal issues (0.9); review letter re discovery (1.1); communicate with J. Rubinstein re same (0.2); revise letter re relevance/privilege (0.8).	3.00	4,350.00
Girgenti, J.	5/17/22	Review and code Marsh documents for specific deposition topics and issues.	5.10	1,861.50
Rubinstein, J.	5/17/22	Confer with R. Leveridge re litigation strategy (0.4); review edits to multiple discovery letters (1.2); communications with co-plaintiff counsel re same (0.3); analysis re policy language (0.1); draft agenda for call with co-plaintiff counsel re strategy (1.0); analysis re litigation plan (1.5); review analysis re potential expert (0.2).	4.70	3,995.00
Rush, M.	5/17/22	Continue analyzing Purdue claims.	2.20	1,540.00
Rush, M.	5/17/22	Draft correspondence to AGLIC re discovery issues.	.30	210.00
Rush, M.	5/17/22	Draft letter to NAE/Aspen re affirmative defenses.	.90	630.00
Gaske, A.	5/17/22	Draft outline re searching policies for certain language.	.60	366.00
Gaske, A.	5/17/22	Confer with I. Agwu re searching policies for certain language.	.30	183.00
Leveridge, R.	5/17/22	Confer with J. Rubinstein re litigation strategy (0.4); communicate with J. Rubinstein, R. Shore, and A. Gaske re legal issues (0.9).	1.30	1,885.00
Leveridge, R.	5/17/22	Review comments from R. Shore to Committee letter (0.3); communicate with co-counsel re draft of letter (0.4).	.70	1,015.00
Leveridge, R.	5/17/22	Review communications with opposing counsel re offensive discovery issues.	.40	580.00
Sraders, S.	5/17/22	Research re broker/insured privilege.	.30	198.00
Sraders, S.	5/17/22	Review information re potential Expert C.	2.00	1,320.00
Kaminsky, E.	5/17/22	Revise discovery correspondence re defensive discovery.	1.40	784.00
Turner, C.	5/17/22	Review letter to Navigators.	.10	20.00
Turner, C.	5/17/22	Continue research re potential medical expert.	3.40	680.00
Turner, C.	5/17/22	Review and organize third-party subpoenas.	.70	140.00
Agwu, I.	5/17/22	Confer with A. Gaske re policy review.	.30	126.00
Agwu, I.	5/17/22	Review policies in adversary proceeding for occurrence language.	5.90	2,478.00
Agwu, I.	5/17/22	Analyze Marsh production for upcoming depositions.	3.50	1,470.00

Invoice Number: 11327095
June 22, 2022

Name	Date	Services	Hours	Amount
Shore, R.	5/18/22	Confer with J. Rubinstein and A. Gaske re policy comparison project (1.1); analyze re experts/consultants issues (0.2); revise letter to insurer re relevance / privilege objections to discovery (0.2).	1.50	2,175.00
Hudson, J.	5/18/22	Confer with E. Kaminsky re responding to insurers' questions on privilege log.	.20	157.00
Girgenti, J.	5/18/22	Continue analyzing and coding Marsh documents for specific deposition topics and issues.	5.00	1,825.00
Rubinstein, J.	5/18/22	Communications with co-plaintiffs' counsel re discovery letters (0.1); confer with Debtors' counsel, R. Leveridge, and M. Rush re trial plan (1.6); analysis re trial plan next steps (0.7); revise litigation task list (0.5); analyze Liberty policies with R. Shore and A. Gaske re policy stipulation project (1.1); analysis re privilege log issue (0.2); review issues in preparation for Marsh deposition (0.9); analysis re potential experts (1.2).	6.30	5,355.00
Rush, M.	5/18/22	Continue drafting letter to insurers re affirmative defenses.	.30	210.00
Rush, M.	5/18/22	Confer with Reed Smith re litigation strategy (1.6); analyze same (1.6).	3.20	2,240.00
Rush, M.	5/18/22	Continue analyzing Purdue claims.	2.10	1,470.00
Rush, M.	5/18/22	Review materials in preparation for Marsh depositions.	.90	630.00
Gaske, A.	5/18/22	Confer with J. Rubinstein and R. Shore re policy comparison project.	1.10	671.00
Gaske, A.	5/18/22	Review spreadsheet re certain policy language.	2.20	1,342.00
Leveridge, R.	5/18/22	Confer with co-counsel re trial planning and related issues (1.6); analyze issues re same (1.2).	2.80	4,060.00
Leveridge, R.	5/18/22	Communications with team re letter to Liberty's counsel re privilege logs.	.90	1,305.00
Leveridge, R.	5/18/22	Communications with team re deposition strategy (0.3); communications with co-counsel re same (0.6).	.90	1,305.00
Kaminsky, E.	5/18/22	Confer with J. Hudson re strategy for defensive discovery.	.20	112.00
Kaminsky, E.	5/18/22	Revise correspondence re defensive discovery.	1.10	616.00
Turner, C.	5/18/22	Review Navigators and NAE and Aspen affirmative defenses letters.	.20	40.00
Agwu, I.	5/18/22	Finish review of policies and spreadsheet.	6.00	2,520.00
Agwu, I.	5/18/22	Analyze Marsh production for upcoming depositions.	4.00	1,680.00

Invoice Number: 11327095
June 22, 2022

Name	Date	Services	Hours	Amount
Shore, R.	5/19/22	Confer with team re case status and strategy (0.8); revise insurer letter re relevance / privileged documents (0.7).	1.50	2,175.00
Hudson, J.	5/19/22	Confer with team re status of litigation and strategy.	.80	628.00
Girgenti, J.	5/19/22	Confer with team re litigation status.	.80	292.00
Girgenti, J.	5/19/22	Review and code Marsh documents for specific deposition topics and issues.	4.40	1,606.00
Rubinstein, J.	5/19/22	Analysis re potential experts (1.3); update litigation task list (0.2); confer with team re status (0.8); confer with offensive discovery team re deposition preparation (1.4); revise discovery communications (0.8); review revised letter to insurers re committee privilege logs (0.3); review research re potential expert (0.3); analysis re Issue #34 (0.9).	6.00	5,100.00
Rush, M.	5/19/22	Confer with litigation team re discovery strategy.	1.40	980.00
Rush, M.	5/19/22	Continue reviewing issues in preparation for depositions.	1.90	1,330.00
Rush, M.	5/19/22	Confer with team re case status and strategy.	.80	560.00
Rush, M.	5/19/22	Research Issue #63.	.50	350.00
Bonesteel, A.	5/19/22	Confer with team re ongoing case strategy.	.80	300.00
Gaske, A.	5/19/22	Confer with R. Leveridge, J. Rubinstein, M. Rush, and S. Sraders re deposition strategy and next steps.	1.40	854.00
Gaske, A.	5/19/22	Confer with litigation team re strategy and next steps.	.80	488.00
Gaske, A.	5/19/22	Review communications re experts.	.20	122.00
Leveridge, R.	5/19/22	Communicate with team re experts.	.30	435.00
Leveridge, R.	5/19/22	Analyze litigation strategy and upcoming events (0.7); confer with J. Rubinstein, M. Rush, A. Gaske, and S. Sraders re deposition planning, expert selection, and related litigation matters (1.4).	2.10	3,045.00
Leveridge, R.	5/19/22	Confer with team re case and project status.	.80	1,160.00
Leveridge, R.	5/19/22	Revise draft letter to Liberty re privilege log issue (0.9); communicate with co-counsel re same (0.3).	1.20	1,740.00
Ogrey, S.	5/19/22	Confer with team re case status.	.80	192.00
Sraders, S.	5/19/22	Confer with R. Leveridge, J. Rubinstein, M. Rush, and A. Gaske re litigation strategy.	1.40	924.00
Sraders, S.	5/19/22	Confer with team re recent developments and strategy for next steps.	.80	528.00
Kaminsky, E.	5/19/22	Confer with team re status and strategy.	.80	448.00
Kaminsky, E.	5/19/22	Revise discovery correspondence re defensive discovery.	1.00	560.00

Invoice Number: 11327095
June 22, 2022

Name	Date	Services	Hours	Amount
Turner, C.	5/19/22	Revise plaintiffs' response to National Union, NAE, and Navigators interrogatories.	.80	160.00
Turner, C.	5/19/22	Confer with team re litigation strategy and case update.	.80	160.00
Hubbard, B.	5/19/22	Confer with team re ongoing status and strategy.	.80	340.00
Agwu, I.	5/19/22	Confer with team re status and strategy.	.80	336.00
Agwu, I.	5/19/22	Continue analyzing Marsh production for upcoming depositions.	7.80	3,276.00
Girgenti, J.	5/20/22	Continue reviewing code Marsh documents for specific deposition topics and issues.	5.00	1,825.00
Rubinstein, J.	5/20/22	Communicate with co-plaintiffs' counsel re letter to insurers re Committee privilege logs (0.6); analysis re potential expert (2.5); communicate with co-plaintiffs' counsel re communication to insurers re depositions (0.1); review identified documents re Marsh productions in preparation re Marsh depositions (2.9); confer with Debtors' counsel re expert retentions (0.5).	6.60	5,610.00
Bonesteel, A.	5/20/22	Confer with A. Gaske, B. Hubbard and I. Agwu re upcoming policy review.	.70	262.50
Gaske, A.	5/20/22	Confer with B. Hubbard, A. Bonesteel, and I. Agwu re program to review insurance policies.	.70	427.00
Leveridge, R.	5/20/22	Communicate with co-counsel re experts (0.2); review material re same (1.0).	1.20	1,740.00
Leveridge, R.	5/20/22	Revise responsive letter to Liberty re Committee privilege logs (1.7); communicate with co-counsel re same (0.5).	2.20	3,190.00
Leveridge, R.	5/20/22	Communicate with team re review of Debtors' insurance documents.	.40	580.00
Turner, C.	5/20/22	Review scheduling and pre-trial order filed on 4.11.2022.	.10	20.00
Turner, C.	5/20/22	Review Navigators correspondence letter.	.10	20.00
Hubbard, B.	5/20/22	Confer with I. Agwu, A. Gaske and A. Bonesteel re Purdue policy review.	.70	297.50
Agwu, I.	5/20/22	Confer with B. Hubbard, A. Gaske and A. Bonesteel re policy review.	.70	294.00
Agwu, I.	5/20/22	Analyze Marsh production for upcoming depositions.	7.90	3,318.00
Shore, R.	5/23/22	Analyze status of pending litigation projects and next steps.	.50	725.00
Girgenti, J.	5/23/22	Review and code Marsh documents for specific deposition topics and issues.	5.00	1,825.00

Invoice Number: 11327095
June 22, 2022

Name	Date	Services	Hours	Amount
Rubinstein, J.	5/23/22	Review prior deposition testimony in preparation for defensive depositions and related preparation tasks (2.9); communicate with M. Rush re Navigators affirmative defenses (0.1); analysis re potential expert witnesses (0.3); review materials in preparation for offensive deposition preparation (1.3); review discovery correspondence from Navigators (0.6); communicate with team re policy analysis program (0.2).	5.40	4,590.00
Rush, M.	5/23/22	Review letter from insurer and documents.	1.00	700.00
Rush, M.	5/23/22	Review materials in preparation for insurer depositions (1.2); confer with A. Gaske and S. Sraders re same (0.4).	1.60	1,120.00
Rush, M.	5/23/22	Review materials in preparation for Marsh depositions.	1.70	1,190.00
Bonesteel, A.	5/23/22	Review incoming insurer productions and update production log.	.40	150.00
Gaske, A.	5/23/22	Confer with M. Rush and S. Sraders re deposition preparation.	.40	244.00
Gaske, A.	5/23/22	Revise Liberty policy comparison spreadsheet re policy stipulation project.	2.70	1,647.00
Gaske, A.	5/23/22	Communicate with partners re program for policy review.	.20	122.00
Leveridge, R.	5/23/22	Communicate with co-counsel re discovery issues (0.3); begin review of objections to Debtors' 30(b)6 deposition notice (0.8); review communication from opposing counsel re discovery (0.3).	1.40	2,030.00
Leveridge, R.	5/23/22	Communicate with team re experts.	.60	870.00
Sraders, S.	5/23/22	Confer with A. Gaske and M. Rush re upcoming depositions.	.40	264.00
Sraders, S.	5/23/22	Communicate with C. Turner and J. Rubinstein re expert research.	.40	264.00
Turner, C.	5/23/22	Research additional potential medical expert.	1.80	360.00
Agwu, I.	5/23/22	Analyze Marsh production for upcoming depositions.	8.00	3,360.00
Girgenti, J.	5/24/22	Continue analyzing and coding Marsh documents for specific deposition topics and issues.	5.10	1,861.50
Rubinstein, J.	5/24/22	Analysis re additional discovery-related projects (1.2); revise Debtors' 30(b)(6) response letter (2.3); communicate with co-plaintiff counsel re same (0.4); continue preparing for Marsh depositions (0.6); analysis re potential expert witness (0.2); analysis re protective order procedures (0.3).	5.00	4,250.00
Rush, M.	5/24/22	Research re Issue #63.	1.90	1,330.00

Invoice Number: 11327095
June 22, 2022

Name	Date	Services	Hours	Amount
Rush, M.	5/24/22	Continue reviewing materials in preparation for Marsh depositions.	5.90	4,130.00
Martinez, S.	5/24/22	Draft calendar of upcoming depositions.	.40	130.00
Gaske, A.	5/24/22	Review sample 30(b)(6) deposition outlines.	.30	183.00
Gaske, A.	5/24/22	Review relevant spreadsheets of insurance policies for importing policies into review platform.	.90	549.00
Gaske, A.	5/24/22	Review version of policies for Insurers #18, #19, and #20 re policy stipulation project.	.60	366.00
Leveridge, R.	5/24/22	Review draft responses by Debtors to 30(b)6 deposition notice (0.9); communicate with co-counsel re same (0.4).	1.30	1,885.00
Leveridge, R.	5/24/22	Communicate with team re depositions.	.30	435.00
Leveridge, R.	5/24/22	Analyze legal research.	1.20	1,740.00
Leveridge, R.	5/24/22	Review correspondence from opposing counsel re stipulation re personal injury proof of claims (0.2); communicate with co-counsel re same (0.2).	.40	580.00
Sraders, S.	5/24/22	Communicate with S. Martinez re upcoming depositions.	.30	198.00
Kaminsky, E.	5/24/22	Revise privilege log re production.	.90	504.00
Hubbard, B.	5/24/22	Review Debtors' policy-related materials for inclusion in database for further analysis.	1.40	595.00
Agwu, I.	5/24/22	Continue analyzing Marsh production for upcoming depositions.	6.50	2,730.00
Shore, R.	5/25/22	Analysis re expert issues.	.50	725.00
Shore, R.	5/25/22	Analyze memorandum re occurrence issue.	1.00	1,450.00
Girgenti, J.	5/25/22	Analyze and code Marsh and Debtors' documents for specific deposition topics and issues.	6.60	2,409.00
Rubinstein, J.	5/25/22	Communicate with review team re document review in preparation for Marsh depositions (0.5); communicate with co-plaintiff counsel re protective order requirements (0.2); update litigation task list (0.2); continue review of historic deposition transcripts in preparation for upcoming depositions (4.5); review UCC comments to discovery correspondence re Debtors' 30(b)(6) deposition (0.2); confer with R. Leveridge re strategy (0.5); analysis re Issue #34 (0.4).	6.50	5,525.00
Rush, M.	5/25/22	Review materials in preparation for Marsh depositions.	4.80	3,360.00
Rush, M.	5/25/22	Review insurers' productions.	1.20	840.00
Bonesteel, A.	5/25/22	Confer with S. Sraders re review of Debtors' policy productions.	.30	112.50
Gaske, A.	5/25/22	Draft Rule 30(b)(6) deposition topics.	2.00	1,220.00

Invoice Number: 11327095
June 22, 2022

Name	Date	Services	Hours	Amount
Leveridge, R.	5/25/22	Review stipulation re personal injury proof of claims (0.5); communicate with co-counsel re same (0.2).	.70	1,015.00
Leveridge, R.	5/25/22	Analyze discovery directed to Marsh and Debtors in preparation for offensive depositions (0.8); confer with J. Rubinstein re strategy (0.5).	1.30	1,885.00
Leveridge, R.	5/25/22	Communicate with team re legal research (0.4); communicate with co-counsel re same (0.4).	.80	1,160.00
Leveridge, R.	5/25/22	Communicate with a prospective expert.	.80	1,160.00
Leveridge, R.	5/25/22	Review legal research provided by co-counsel.	.80	1,160.00
Sraders, S.	5/25/22	Review materials produced by insurers in discovery.	1.00	660.00
Sraders, S.	5/25/22	Review materials re Issue #34.	.40	264.00
Agwu, I.	5/25/22	Continue analyzing Marsh production for upcoming depositions.	8.00	3,360.00
Shore, R.	5/26/22	Confer with team re next steps.	.60	870.00
Rubinstein, J.	5/26/22	Confer with co-plaintiffs' counsel re protective order issues (0.4); review and provide comments on draft correspondence to insurer counsel (1.2); communicate with Debtors' counsel re deposition preparation (1.2); review revised privilege log (0.3); revise litigation task list (0.4); confer with team re status and strategy (0.6); communicate with potential expert (0.3); confer with offensive discovery team re next steps on various projects (0.8); review proposed edits to letter re Debtors' 30(b)(6) deposition (0.4); correspond with co-counsel re same (0.4).	6.00	5,100.00
Rush, M.	5/26/22	Review documents in preparation of depositions.	2.80	1,960.00
Rush, M.	5/26/22	Confer with team re discovery issues.	.80	560.00
Rush, M.	5/26/22	Confer with team re case status and strategy.	.60	420.00
Rush, M.	5/26/22	Review Purdue claims.	2.20	1,540.00
Martinez, S.	5/26/22	Confer with M. Rush, R. Leveridge, J. Rubinstein, R. Shore, A. Gaske, S. Sraders, I. Agwu, B. Hubbard, A. Bonesteel, E. Kaminsky, S. Ogrey and C. Turner re case status and strategy.	.60	195.00
Martinez, S.	5/26/22	Review policy database re KCIC/Ligado language reports; correspond with A. Gaske re same.	.40	130.00
Bonesteel, A.	5/26/22	Confer with team re ongoing case strategy.	.60	225.00
Gaske, A.	5/26/22	Confer with M. Rush, R. Leveridge, J. Rubinstein, and S. Sraders re offensive discovery strategy.	.80	488.00
Gaske, A.	5/26/22	Confer with team re litigation case strategy and assignments.	.60	366.00
Gaske, A.	5/26/22	Review research on Issue #34.	.30	183.00

Invoice Number: 11327095
June 22, 2022

Name	Date	Services	Hours	Amount
Gaske, A.	5/26/22	Review current knowledge of Debtors' policies for inclusion into chart for importing policies project.	1.20	732.00
Gaske, A.	5/26/22	Review discovery requests and responses re deposition preparation.	1.50	915.00
Gaske, A.	5/26/22	Review version of policies for Insurers #18, #19, and #20 re policy stipulation project.	1.20	732.00
Leveridge, R.	5/26/22	Review deposition testimony.	1.10	1,595.00
Leveridge, R.	5/26/22	Confer with team re deposition preparation.	.80	1,160.00
Leveridge, R.	5/26/22	Confer with team re litigation status and strategy.	.60	870.00
Ogrey, S.	5/26/22	Confer with R. Shore, R. Leveridge, J. Rubinstein, M. Rush, A. Gaske, S. Sraders, E. Kaminsky, B. Hubbard, A. Bonesteel, I. Agwu, S. Martinez, S. Ogrey and Turner re case strategy.	.60	144.00
Sraders, S.	5/26/22	Communicate with J. Rubinstein re potential expert.	.30	198.00
Sraders, S.	5/26/22	Confer with team re recent developments and strategy for next steps.	.60	396.00
Sraders, S.	5/26/22	Analyze insurer documents in preparation for upcoming depositions.	1.00	660.00
Sraders, S.	5/26/22	Confer with J. Rubinstein, R. Leveridge, M. Rush, and A. Gaske re strategy for upcoming depositions.	.80	528.00
Sraders, S.	5/26/22	Review memorandum and case law re Issue #34.	1.70	1,122.00
Kaminsky, E.	5/26/22	Draft production letter re defensive production.	.20	112.00
Kaminsky, E.	5/26/22	Confer with team re litigation strategy.	.60	336.00
Turner, C.	5/26/22	Confer with team re litigation update.	.60	120.00
Hubbard, B.	5/26/22	Review prior modeling and draft correspondence re liability analysis and coverage valuation.	.70	297.50
Hubbard, B.	5/26/22	Confer with team re ongoing status and strategy.	.60	255.00
Agwu, I.	5/26/22	Analyze Marsh production for upcoming depositions.	8.90	3,738.00
Agwu, I.	5/26/22	Confer with team re case update.	.60	252.00
Shore, R.	5/27/22	Communicate with J. Rubinstein re discovery issues.	1.00	1,450.00
Shore, R.	5/27/22	Analyze discovery.	1.00	1,450.00
Rubinstein, J.	5/27/22	Confer with Debtors' counsel re discovery and deposition preparation/tasks (0.7); review protective order issues (0.3); review status of production of revised privilege log (0.1); confer with co-plaintiffs' counsel re Debtors' 30(b)(6) correspondence and preparation re same (1.4); communicate with R. Shore re discovery issues (1.0); analysis re potential expert (0.2); correspond with team re litigation tasks (0.2).	3.90	3,315.00

Invoice Number: 11327095
June 22, 2022

Name	Date	Services	Hours	Amount
Rush, M.	5/27/22	Continue reviewing Purdue claims.	.70	490.00
Rush, M.	5/27/22	Confer with co-counsel re Marsh depositions and documents.	.90	630.00
Rush, M.	5/27/22	Confer with co-counsel re depositions.	1.10	770.00
Gaske, A.	5/27/22	Revise spreadsheet template re uploading policies to policy review system.	.30	183.00
Gaske, A.	5/27/22	Draft Rule 30(b)(6) deposition topics.	1.80	1,098.00
Gaske, A.	5/27/22	Revise policy comparison chart for Insurers #18, #19, and #20 re policy stipulation project.	1.90	1,159.00
Leveridge, R.	5/27/22	Analyze discovery issues (0.8); confer with co-counsel re discovery issues (1.1).	1.90	2,755.00
Leveridge, R.	5/27/22	Review communication to potential expert (0.2); communicate with co-counsel re experts (0.2).	.40	580.00
Sraders, S.	5/27/22	Research re broker privilege.	2.80	1,848.00
Hubbard, B.	5/27/22	Review and provide input re insurance listing load sheet.	1.20	510.00
Rubinstein, J.	5/30/22	Communications with Debtors' counsel re Debtors' 30(b)(6) deposition communications with insurers.	.50	425.00
Leveridge, R.	5/30/22	Review communication from opposing counsel re discovery issue (0.5); review communication to co-counsel re same (0.3).	.80	1,160.00
Shore, R.	5/31/22	Analyze expert retention (0.5); confer with UCC counsel re same (0.5); analyze pending discovery issues (0.5); review response to insurers re deposition (0.6); review and provide comments to deposition preparation outline (0.4).	2.50	3,625.00
Rubinstein, J.	5/31/22	Correspond with potential expert (0.2); review materials in preparation for Marsh and Debtors' depositions (2.1); confer with Debtors' counsel re same (1.0); communications with co-counsel re expert retentions (0.6); communicate with M. Rush re litigation tools (0.2); revise offensive deposition materials (3.4); provide edits to discovery correspondence to insurers (0.5).	8.00	6,800.00
Rush, M.	5/31/22	Review materials in preparation for Debtors' deposition.	.90	630.00
Rush, M.	5/31/22	Review Marsh documents in preparation for depositions.	2.50	1,750.00
Bonesteel, A.	5/31/22	Communicate with B. Hubbard and A. Currin re upcoming policy review protocol.	2.50	937.50
Gaske, A.	5/31/22	Revise topics re Rule 30(b) notice.	2.10	1,281.00
Gaske, A.	5/31/22	Analyze policy comparison for Insurers #18, #19, and #20.	1.80	1,098.00

Invoice Number: 11327095
June 22, 2022

Name	Date	Services	Hours	Amount
Leveridge, R.	5/31/22	Conference call with Debtors' counsel re deposition (1.0); review proposed communication to opposing counsel (0.5); communications with co-counsel re same (0.4).	1.90	2,755.00
Leveridge, R.	5/31/22	Review and provide comments on draft deposition notice.	.80	1,160.00
Leveridge, R.	5/31/22	Communications with co-counsel re experts.	.80	1,160.00
Sraders, S.	5/31/22	Review research re Issue #34.	.20	132.00
Hubbard, B.	5/31/22	Continue updates to import sheet for insurance policy language and meta data.	1.70	722.50
		Project Total:	644.20	\$ 443,303.00
TOTAL CHARGEABLE HOURS			657.80	
TOTAL FEES				\$ 457,300.50

TIMEKEEPER SUMMARY

Timekeeper	Hours	Rate	Total
Gilbert, S.	5.40	1,800.00	9,720.00
Quinn, K.	1.90	1,250.00	2,375.00
Shore, R.	22.20	1,450.00	32,190.00
Hudson, J.	7.70	785.00	6,044.50
Girgenti, J.	74.80	365.00	27,302.00
Rubinstein, J.	106.80	850.00	90,780.00
Rush, M.	99.10	700.00	69,370.00
Martinez, S.	4.70	325.00	1,527.50
Bonesteel, A.	9.90	375.00	3,712.50
Gaske, A.	39.50	610.00	24,095.00
Leveridge, R.	65.80	1,450.00	95,410.00
Ogrey, S.	5.00	240.00	1,200.00
Sraders, S.	17.20	660.00	11,352.00
Kaminsky, E.	31.70	560.00	17,752.00
Turner, C.	24.70	200.00	4,940.00
Hubbard, B.	28.40	425.00	12,070.00
Agwu, I.	113.00	420.00	47,460.00
TOTALS	657.80		\$ 457,300.50

Invoice Number: 11327095
June 22, 2022

TASK SUMMARY

Task	Description	Hours	Amount
A004	Case Administration	5.40	1,105.00
A009	Meetings / Communications with AHC & Creditors	6.20	9,292.50
A019	Plan of Reorganization / Disclosure Statement	2.00	3,600.00
A020	Insurance Adversary Proceeding	644.20	443,303.00

EXPENSE DETAILS

E118: Litigation Support Vendors

Date	Description	Task	Amount
4/30/22	Contracted Professional Services - Cobra Legal Solutions LLC - Tech time/ License/ Hosting: 4.2022	E118	1,618.96
	Sub-Total of Expenses:		\$ 1,618.96
	TOTAL EXPENSES		\$ 1,618.96
	TOTAL FEES AND EXPENSES		\$ 458,919.46